

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Wireless E911 Location Accuracy Requirements |) | PS Docket No. 07-114 |
| |) | |
| Revision of the Commission's Rules to Ensure |) | CC Docket No. 94-102 |
| Compatibility with Enhanced 911 Emergency |) | |
| Calling Systems |) | |
| |) | |
| Association of Public-Safety Communications |) | |
| Officials-International, Inc. Request for |) | |
| Declaratory Ruling |) | |
| |) | |
| 911 Requirements for IP-Enabled Service Providers |) | WC Docket NO. 05-196 |
| |) | |

COMMENTS OF JOHNSON COUNTY KS EMERGENCY COMMUNICATIONS

I. INTRODUCTION

Johnson County KS Emergency Communications provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-108, adopted by the Commission on May 31, 2007. Johnson County Emergency Communications is a secondary PSAP and countywide Fire / EMS communications center serving the citizens of the county and the fourteen Fire / EMS agencies in the county.

II. DISCUSSION

- A.** As the Commission is well aware, the accuracy of the location information accompanying a wireless 9-1-1 call is of paramount importance to the calltaker receiving the call and the responders who will attempt to locate the caller. This automatic location information is often of greater importance in rural and wilderness areas, since callers in these areas frequently have difficulty giving accurate descriptions of their exact locations. These rural and wilderness areas are often the areas where the location information has lower accuracy, due to the low tower density in these sparsely-populated areas.
- B.** Aggregating results of wireless location accuracy testing over entire states or multi-state coverage areas will allow carriers to provide unacceptably inaccurate location information in significant portions of their service areas, offset by much

greater accuracy in areas with higher tower density. As APCO stated in its petition and the Commission quoted in the associated NPRM, “That could leave significant portions of the country with virtually useless levels of E9-1-1 accuracy, essentially nullifying Phase II in those areas.”

- C. We understand, as does APCO in its petition, that requiring separate accuracy testing within each of more than 6,000 PSAP service areas in the nation is probably prohibitive. APCO suggested that groups of PSAPs serving adjoining areas could be treated as single areas for testing purposes if the PSAPs so chose. Absent such choices or agreements, other methods could be devised for aggregating small PSAP service areas with similar wireless-carrier infrastructure into reasonably-sized testing areas. But any such aggregation should be done for the purpose of making the testing process practical, not for the purpose of joining high-accuracy areas to low-accuracy areas so the larger area will successfully pass the test.

III. CONCLUSION

We urge the Commission to rule in favor of the APCO petition as proposed in NPRM 07-108.

Respectfully Submitted,

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